

LOVETT & GOULD, LLP  
ATTORNEYS AT LAWJONATHAN LOVETT  
JANE BILUS GOULD222 BLOOMINGDALE ROAD  
WHITE PLAINS, N.Y. 10605KIM PATRICIA BERG+  
DRITA NICAJ+

+also admitted in New Jersey

914-428-8401  
FAX 914-428-8916

September 17, 2008

By fax

Hon. Stephen C. Robinson  
United States District Court  
Southern District of New York  
300 Quaroppas Street  
White Plains, New York 10601

## MEMO ENDORSED

Re: Nagle v. Marron et. al  
07 Civ 2860 (SCR)

Dear Judge Robinson:

On Friday, September 12, 2008, Jonathan Lovett appeared before the Court in a conference in this matter. At that time the Court set a briefing schedule for Defendants' Motion for Summary Judgment. According to that schedule, Defendants are to serve their motion papers by October 13, 2008. Plaintiff's opposition papers are due November 3, 2008 and Defendants' Reply papers are due November 7, 2008.

On behalf of Plaintiff, we are respectfully requesting a modification of that schedule as follows as set forth below.

We propose that Defendants serve their motion on or before November 21, 2008, Plaintiff will file her opposition papers on or before December 12, 2008 and Defendants will serve Reply papers, if any, on or before December 26, 2008.

As the individual who has litigated the matter on behalf of Plaintiff, I am making this request because I will be absent from our office from October 13 until October 27 and I am scheduled to commence a two week trial before Judge Joseph Bianco in the Eastern District of New York in the case of Pisani v. Staten Island University Hospital Center, 06 CV 1016 (JFB)(MLO) on November 10, 2008.

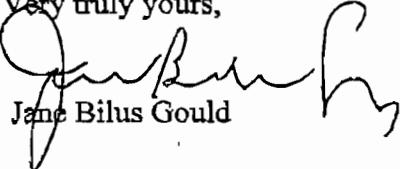
Defendants' counsel consents to this request.



APPLICATION GRANTED  
Stephen C. Robinson  
HON. STEPHEN C. ROBINSON  
9/19/08

Thank you for your consideration.

Very truly yours,

  
Jane Bilus Gould

Cc by fax:  
Miranda Sokoloff Sambursky Sloane Verveniotis  
Melissa Holtzer, Esq.